

Yolo/Solano AQMD Response to EPA Comments

The following are the District responses to John Walser's comments regarding Yolo/Solano AQMD's proposed Title V Operating Permit for International Home Foods, Inc.

#1

Comment *Boiler System* - "...please add a condition clarifying PUC-regulated natural gas only shall be used and maintain records of fuel use."

Response The District has added language which limits fuel burned to only PUC-regulated natural gas. Fuel use records are a requirement of the permit.

#2

Comment *Particulate Matter* - "...you must provide an analysis that clearly demonstrates compliance with this limit."

Response A calculation based on the maximum allowable emission rate is included in the evaluation. The evaluation shows that the source will be in continual compliance with the standard.

#3

Comment *Boiler System (periodic monitoring)* - "...EPA recommends periodic source testing of the boilers..."

Response The District has added language which requires annually that International Home Foods, Inc. conduct either a source test or a boiler tune up. As discussed in great detail with John Walser, source tests shall be completed triennially at a minimum. The District has also added language requiring annual reports submitted and has specified acceptable test methods for the source testing.

#4

Comment *Cooling Towers* - "...EPA believes that this prohibition on chromium use precludes the need for periodic monitoring or sampling..."

Response The District concurs that periodic monitoring and/or sampling are not required. Chromium additives are not legally available within the State of California and the use of these additives are also against District rules.

#5

Comment *Compliance* - There was a typographical error on a SIP approval date

Response This correction has been made.

#6

Comment *MACT Standard* - "...We recommend adding a discussion to the General Requirements section of the permit discussing this (issue)."

Response The District has added language which discussed the applicability of the MACT standard with respect to this source and stated that this source is not subject to the MACT in question.

#7

Comment *Prompt Reporting* - "...the District should define 'prompt'..."

Response The District has added language which defines "prompt" to be 10 calendar days.

#8

Comment *Pneumatic Flour Handling System (periodic monitoring)*- "...EPA recommends adding a condition to the permit that states that the dust collectors shall be inspected daily while in operation for evidence of particulate matter breakthrough and replaced as needed. At least one spare set of dust collector filters should be maintained on the premises at all times. Also records of the dust collector inspections, maintenance, and repair shall be maintained..."

Response The District has added a condition which requires the requested monitoring and recordkeeping.